

**DECLARATION OF PETER PRUSINOWSKI**

I, Peter Prusinowski, hereby declare,

1. I am above the age of eighteen and competent to make this declaration. This declaration is based on my personal knowledge and, if called to testify, I would competently testify thereto.

2. I, along with my counsel from Gordon Rees (Stephen Freeland), spent approximately thirty (30) minutes speaking with the receiver, Kevin Dooley, and his counsel, Robin Weiss, at the Courthouse within minutes of the Court's entry of the Temporary Restraining Order ("TRO") on September 20, 2024, describing various accounts of Defendant Empire Holdings Group LLC d/b/a Ecommerce Empire Builders and Storefunnels.net ("EEB"), EEB's business, and that I operated EEB's business from my home using my laptop, which also had many personal files on it.

3. I delivered my laptop and cell phone to the receiver at approximately 3:00 pm EST on Monday, September 23, 2024, within one business day of the TRO being entered. This was the time I scheduled with the receiver and his counsel to deliver these devices.

4. I did encounter significant difficulties cooperating with the receiver's many requests because I no longer had my laptop or cell phone and.

5. I did not receive my cell phone back until Wednesday October 2, 2024.

6. I did not receive my laptop back until Friday October 4, 2024.

7. These devices contained the information that I needed to respond in full to the receiver's requests. I understand, however, that the receiver imaged both my laptop and cellphone shortly after taking possession of them from me.

8. Upon the court entering the Temporary Restraining Order, freezing all of my personal and business assets, including the funds provided for attorney's fees, I immediately started soliciting friends, family, and former business associates for funds to help support my family and to assist with my legal defense.

9. None of my family has the resources necessary to assist me.

10. The only way they could provide the funds necessary to pay for my legal defenses and living costs was to obtain a loan or mortgage on their real estate.

11. In discussing it with my own mother, it was the only option for her, and I couldn't ask her to do that.

12. I asked every marketer I know.

13. I and my respective counsel asked more than 40 individuals and business owners to help.

14. None of them would participate in my defense or assistance of supporting my family.

15. I could not find the resources necessary to pay my outstanding obligations to Gordon Rees.

16. In desperation, I was able find one friend which provided me a fraction of the funds owed to Gordon Rees to assist me to retain Guardian Law, LLC for the limited purpose of attempting to obtain a settlement in this matter.

17. Without the resources frozen by the TRO, I don't have the means to live let alone have the means to finance an adequate defense.

18. If I had the necessary resources, I would fight the TRO because EEB does not maintain or store sales data for its clients. This is because EEB does not sell and operate a business

for its clients, but rather provides education and consultant services for its clients who own their own businesses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed this 28<sup>th</sup> day of October, 2024.

Signed by:

*Peter Prusinowski*

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Peter Prusinowski